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May 16, 2025

VIA ELECTRONIC FILING

Honorable James B. Clark, III, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: **Ramirez v. World Mission Society, Church of God, et. al.**
Civil Action No. 2:14-cv-01708 (JMV)(JBC)

Dear Judge Clark:

On behalf of defendant, World Mission Society Church of God, we write to respectfully request a one-week extension of the deadline for Defendants to file their opposition to Plaintiff's motion to dismiss.¹

Pursuant to Court Order entered April 23, 2025, Defendants' responsive filing is due today, May 16, 2025. DKT 311. The basis for this request is that the parties continue to negotiate a form of stipulation that hopefully amicably resolves the pending motion and entire litigation.

Plaintiff's counsel consents to this request.

Thank you for the Court's attention to this matter.

PROCACCINI LAW GROUP, LLC


Steven L. Procaccini

cc: Counsel of Record *via ECF and email*

¹ If granted, Defendants' new deadline to file their opposition would be May 23, 2025.